

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	
)	No. 20-CR-10098-WGY
BRIAN GILBERT, STEPHANIE POPP,)	
STEPHANIE STOCKWELL and)	
VERONICA ZEA)	
)	
Defendants)	
_____)	

UNOPPOSED MOTION TO TERMINATE PROBATION OF DEFENDANT VERONICA ZEA

Veronica Zea, Defendant in the above captioned matter, hereby requests an order from this Court terminating her current period of probation. This request is based on the information set forth in the Declaration of Frank R. Ubhaus attached hereto, the files and records in this matter and any additional information that might arise in the event the Court believes that a hearing is necessary for a resolution of this request.

FACTUAL BACKGROUND AND FACTS IN SUPPORT OF MOTION

Veronica Zea was sentenced by this Court on November 3, 2022, following her plea of guilty to one count of conspiracy to commit cyberstalking in violation of Title 18 U.S.C. 371 and one count of obstruction of justice in violation of Title 18 U.S.C. 371. The Court imposed a sentence of twenty-four (24) months of probation on the condition, among others, that Ms. Zea be subject to twelve (12) months of location monitoring. That condition required, pursuant to the rules of the United States Probation Office for the Northern District of California, that Ms. Zea wear an ankle bracelet for the duration of the twelve-month period. The Court also imposed a

\$5,000 fine along with a \$200 penalty assessment. As set forth in the Declaration of Frank R. Ubhaus submitted in support of this request, the fine and penalty assessment were paid shortly after sentencing and Ms. Zea has completed the required twelve months of location monitoring. As further set forth in the Ubhaus declaration, this request for early termination of probation is not opposed by the United States and is not opposed by Ms. Zea's supervising probation officer. As noted in the Government's Sentencing Memorandum in this case, Veronica Zea cooperated fully with the Government in connection with its investigation in this case which led to the Government's motion pursuant to Section 5K of the United States Sentencing Guidelines. As the Government also noted, Veronica Zea was one of the least culpable of the people involved in the conspiracy, had little experience in business, suffered from autism and depression, and was following the directions of her superior with respect to her involvement in the events that led to her conviction.

Accordingly, based on the foregoing and the Declaration of Frank R. Ubhaus, it is respectfully submitted that no useful purpose will be served by requiring Veronica Zea to complete the remaining period of her probationary sentence and that early termination of probation in this matter is warranted.

Respectfully submitted,

FRANK R. UBHAUS,

/s/ Frank R. Ubhaus

Frank R. Ubhaus, Esq.

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March 26, 2024

Certificate of Service

I hereby certify that on this 26th day of March, 2024, this document was filed through the Court's ECF system and will therefore be sent electronically to the registered participants identified in the Notice of Electronic Filing.

/s/ Frank R. Ubhaus
Frank R. Ubhaus